

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA *ex rel.*
HAMID (JOE) LAHIJANI,

Plaintiff,

- against -

DELTA UNIFORMS, INC., and
GEORGE ILOULIAN (a/k/a GEORGE
ILLULIAN), individually,

Defendants.

19 Civ. 3290 (PGG)

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

- against -

DELTA UNIFORMS, INC. and
GEORGE ILOULIAN,

Defendants.

**DECLARATION OF AUSA DOMINIKA TARCZYNSKA IN SUPPORT OF THE
UNITED STATES OF AMERICA’S MOTION FOR SUMMARY JUDGMENT**

1. I, DOMINIKA TARCZYNSKA, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

2. I am an Assistant United States Attorney in the United States Attorney’s Office for the Southern District of New York, and represent the United States of America (the “Government”) in the above-referenced action. I have been assigned this matter, and am familiar with the proceedings herein. I make this declaration in support of the motion for summary judgment submitted by the Government.

3. All exhibits attached hereto have been redacted as necessary to remove bank account information as required by Federal Rule of Civil Procedure 5.2. Only relevant attachments and/or pages of email chains have been included as part of the exhibits attached hereto.

4. Attached hereto as Exhibit 1 is a true and correct copy of the Criminal Indictment in *United States v. Ilouliau*, 21 Crim 579 (PGG), Dkt. No. 1.

5. Attached hereto as Exhibit 2 is a true and correct copy of the Plea Hearing Transcript, dated July 26, 2022, in *United States v. Ilouliau*, 21 Crim. 579 (PGG) (SDNY), Dkt. No. 41.

6. Attached hereto as Exhibit 3 is a true and correct copy of the Consent Preliminary Order of Forfeiture / Money Judgment in *United States v. Ilouliau*, 21 Crim. 579 (PGG) (SDNY), Dkt. No. 40.

7. Attached hereto as Exhibit 4 is a true and correct copy of the Sentencing Transcript, dated April 11, 2023, in *United States v. Ilouliau*, 21 Crim. 579 (PGG) (SDNY).

8. Attached hereto as Exhibit 5 is a true and correct copy of the Criminal Judgment in *United States v. Ilouliau*, 21 Crim. 579 (PGG) (SDNY), Dkt. No. 60.

9. Attached hereto as Exhibit 6 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0014855-5 obtained from Marie Necci Customs Broker, Inc.

10. Attached hereto as Exhibit 7 is a true and correct copy of a September 12, 2016, Email and attachments, bearing the beginning bates number USAO_072480, which were obtained during the course of the criminal investigation by means of a search warrant issued to Yahoo Inc.

11. Attached hereto as Exhibit 8 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0014942-1 obtained from Marie Necci Customs Broker, Inc.

12. Attached hereto as Exhibit 9 is a true and correct copy of a November 14, 2016, Email and attachments, bearing the beginning bates number USAO_325913, which was obtained from Relator Hamid (Joe) Lahijani (“Relator”).

13. Attached hereto as Exhibit 10 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0014980-1 obtained from Marie Necci Customs Broker, Inc.

14. Attached hereto as Exhibit 11 is a true and correct copy of a November 15, 2016, Email and attachments, bearing the beginning bates number USAO_325946, which was obtained from Relator.

15. Attached hereto as Exhibit 12 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015173-2 obtained from Marie Necci Customs Broker, Inc.

16. Attached hereto as Exhibit 13 is a true and correct copy of an April 11, 2017, Email and attachments, bearing the beginning bates number USAO_327269, which was obtained from Relator.

17. Attached hereto as Exhibit 14 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015198-9 obtained from Marie Necci Customs Broker, Inc.

18. Attached hereto as Exhibit 15 is a true and correct copy of an April 25, 2017, Email and attachments, bearing the beginning bates number USAO_327325, which was obtained from Relator.

19. Attached hereto as Exhibit 16 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015436-3 obtained from Marie Necci Customs Broker, Inc.

20. Attached hereto as Exhibit 17 is a true and correct copy of an October 9, 2017, Email and attachments, bearing the beginning bates number USAO_328702, which were obtained during the course of the criminal investigation by means of a search warrant issued to Yahoo Inc.

21. Attached hereto as Exhibit 18 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015602-0 obtained from Marie Necci Customs Broker, Inc.

22. Attached hereto as Exhibit 19 is a true and correct copy of a February 10, 2018, Email and attachments, bearing the beginning bates number USAO_282663, which were obtained during the course of the criminal investigation by means of a search warrant issued to Yahoo Inc.

23. Attached hereto as Exhibit 20 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015672-3 obtained from Marie Necci Customs Broker, Inc.

24. Attached hereto as Exhibit 21 is a true and correct copy of an April 5, 2018, Email and attachments, bearing the beginning bates number USAO_285665, which were obtained during the course of the criminal investigation by means of a search warrant issued to Yahoo Inc.

25. Attached hereto as Exhibit 22 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015701-0 obtained from Marie Necci Customs Broker, Inc.

26. Attached hereto as Exhibit 23 is a true and correct copy of a May 9, 2018, Email and attachments, bearing the beginning bates number USAO_288186, which were obtained during the course of the criminal investigation by means of a search warrant issued to Yahoo Inc.

27. Attached hereto as Exhibit 24 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015849-7 obtained from Marie Necci Customs Broker, Inc.

28. Attached hereto as Exhibit 25 is a true and correct copy of an August 6, 2018, Email and attachments, bearing the beginning bates number USAO_037585, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

29. Attached hereto as Exhibit 26 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0015922-2 obtained from Marie Necci Customs Broker, Inc.

30. Attached hereto as Exhibit 27 is a true and correct copy of a November 15, 2018, Email and attachments, bearing the beginning bates number USAO_000663, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

31. Attached hereto as Exhibit 28 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016016-2 obtained from Marie Necci Customs Broker, Inc.

32. Attached hereto as Exhibit 29 is a true and correct copy of a January 24, 2019, Email and attachments, bearing the beginning bates number USAO_004830, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

33. Attached hereto as Exhibit 30 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016160-8 obtained from Marie Necci Customs Broker, Inc.

34. Attached hereto as Exhibit 31 is a true and correct copy of a June 6, 2019, Email and attachments, bearing the beginning bates number USAO_12386, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

35. Attached hereto as Exhibit 32 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016189-7 obtained from Marie Necci Customs Broker, Inc.

36. Attached hereto as Exhibit 33 is a true and correct copy of a June 25, 2019, Email and attachments, bearing the beginning bates number USAO_011974, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

37. Attached hereto as Exhibit 34 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016282-0 obtained from Marie Necci Customs Broker, Inc.

38. Attached hereto as Exhibit 35 is a true and correct copy of a September 3, 2019, Email and attachments, bearing the beginning bates number USAO_014764, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

39. Attached hereto as Exhibit 36 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016547-6 obtained from Marie Necci Customs Broker, Inc.

40. Attached hereto as Exhibit 37 is a true and correct copy of a February 3, 2020, Email and attachments, bearing the beginning bates number USAO_048074, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

41. Attached hereto as Exhibit 38 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016699-5 obtained from Marie Necci Customs Broker, Inc.

42. Attached hereto as Exhibit 39 is a true and correct copy of a May 28, 2020, Email and attachments, bearing the beginning bates number USAO_024757, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

43. Attached hereto as Exhibit 40 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016715-9 obtained from Marie Necci Customs Broker, Inc.

44. Attached hereto as Exhibit 41 is a true and correct copy of a June 11, 2020, Email and attachments, bearing the beginning bates number USAO_025141, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

45. Attached hereto as Exhibit 42 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016742-3 obtained from Marie Necci Customs Broker, Inc.

46. Attached hereto as Exhibit 43 is a true and correct copy of a July 14, 2020, Email and attachments, bearing the beginning bates number USAO_026579, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

47. Attached hereto as Exhibit 44 is a true and correct copy of CBP Form 7501 and supporting documentation for Entry No. CBR-0016829-8 obtained from Marie Necci Customs Broker, Inc.

48. Attached hereto as Exhibit 45 is a true and correct copy of a September 9, 2020, Email and attachments, bearing the beginning bates number USAO_033428, which were obtained during the course of the criminal investigation by means of a search warrant issued to Google LLC.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 2, 2024

/s/ Dominika Tarczynska
Dominika Tarczynska